

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DOUGLAS E. MARTIN,

Plaintiff,

v.

LIBERTY MUTUAL INSURANCE
COMPANY, a corporation,

Defendant.

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Case No. 2:06CV514MHT

AGREED MOTION TO EXTEND DISPOSITIVE
MOTION CUTOFF

Comes now Defendant, with the express consent and agreement of Plaintiff's Counsel, and moves the Court to extend the cutoff for filing dispositive motions until on or before March 30, 2007. In support of this motion, Defendant would show unto the Court as follows:

(1) After several attempts at scheduling, Defendant was just able to take the deposition of Plaintiff on February 22, 2007. The transcript of this deposition is needed in order to prepare a Motion for Summary Judgment.

(2) Plaintiff has no opposition, and has expressly consented, to this motion.

(3) This extension will not affect any other cutoff dates or cause a delay of the trial setting in this case.

WHEREFORE, Defendant respectfully moves the Court to enter an Order extending the cutoff for filing dispositive motions through and including March 30, 2007.

s/Richard B. Garrett

Bar Number: (ASB-0782-A29R)

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing upon:

Dwayne L. Brown, Esquire
P. O. Box 230205
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filing the foregoing with the Clerk via e-file, who will then serve said counsel.

s/Richard B. Garrett
Of Counsel